

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----x
UNITED STATES OF AMERICA,

- v. -

ROBERT COPLAN,
MARTIN NISSENBAUM,
RICHARD SHAPIRO, and
BRIAN VAUGHN,

Defendants.

: AFFIDAVIT OF PAUL B. BERGMAN
: IN SUPPORT OF MOTION FOR
: ADMISSION OF AMANDA B.
: BARBOUR PRO HAC VICE

07 Cr. 453 (SHS)

STATE OF NEW YORK

ss.:

COUNTY OF NEW YORK

PAUL B. BERGMAN, being duly sworn, deposes and says:

1. I am local counsel for Brian Vaughn, a defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit in support of the within motion to admit Amanda B. Barbour as counsel *pro hac vice* to represent Brian Vaughn in this matter. Except where the context shows otherwise, this affidavit is made upon information and belief.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in March, 1968. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Amanda B. Barbour is an associate at Butler, Snow, O'Mara, Stevens & Cannada, PLLC, in Jackson, Mississippi.

4. Prior to her position at Butler Snow, Ms. Barbour served for three years as an Assistant District Attorney in the Harris County, Texas District Attorney's Office and for two years as a Deputy District Attorney in the Jefferson County, Alabama, District Attorney's Office. She served as a clerk to Chief Judge Loren A. Smith of the U.S. Court of Federal Claims and is admitted to the Bars of the United States District Court of the Northern District of Mississippi, United States District Court of the Southern District of Mississippi, the United States Court of Appeals for the Fifth Circuit, and the United States Supreme Court. In private practice, Ms. Barbour has represented corporate clients in large, complex federal criminal investigations.

5. I believe these impressive credentials demonstrate that Ms. Barbour is a person of integrity and a skilled attorney, experienced in Federal Practice and familiar with the Federal Rules of Criminal Procedure and the Federal Rules of Evidence. A certified copy of Ms. Barbour's current Certificate of Good Standing from the Supreme Court of Mississippi is annexed hereto as Exhibit A.

6. Accordingly, I am pleased to move the admission of Amanda B. Barbour *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Amanda B. Barbour, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Amanda B. Barbour, *pro hac vice* to represent Brian Vaughn in the above captioned matter, be granted.

Sworn to before me this
14th day of June, 2007

Phyllis A. Malgieri
NOTARY PUBLIC

PHYLLIS A. MALGIERI
Notary Public, State Of New York
No. 43-4802265
Qualified In Richmond County
Commission Expires June 30, 2010

P.B.B.
PAUL B. BERGMAN